

REMARKS

Claims 16-57 and 62 were previously canceled. Claims 1-15 and 58-61 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests that the rejections be withdrawn and that the application be forwarded on to issuance.

The Claim Rejections

Claims 1-3, 5-8, 10-11, 14 and 58-61 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,778,949 to Duan, et al. (hereinafter "Duan") in view of U.S. Patent No. 4,866,670 to Adachi, et al. (hereinafter "Adachi").

Claims 4, 12-13 and 15 stand rejected under 35 U.S.C. § 103(a) as being obvious over Duan in view of Adachi and further in view of U.S. Patent No. 6,092,034 to McCarley, et al. (hereinafter "McCarley").

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being obvious over Duan in view of Adachi and further in view of U.S. Patent No. 6,139,201 to Carbonell, et al. (hereinafter "Carbonell").

The Claims

Claim 1 recites a reading system comprising:

- a user interface configured to allow a user to select existing text in a non-native language and view a translation of the selected text in a native language; and
- a cross-language reading wizard comprising:
 - a parser for parsing selected text into individual translation units,
 - a word translation selector for choosing candidate word translations for the

- translation units, and
- a translation generator for translating the candidate word translations into
- corresponding words or phrases in the native language that can be presented to the user via the user interface.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Duan in view of Adachi. Applicant respectfully disagrees and submits that the Office has failed to establish a *prima facie* case of obviousness with respect to this claim for at least the reasons discussed below.

First, the Office's *prima facie* case of obviousness fails for at least the reason that the combination of cited references fails to teach all of this claim's recited features. More specifically, neither reference teaches the feature of a user interface configured to allow a user to *select existing text* in a non-native language and view a translation of the selected text in a native language. In point of fact, the Office admits that neither Duan nor Adachi "explicitly teach[es]...selecting an existing text for translation from a source language to a target language." Office Action at page 3-4. Further, Duan explains its embodiment as:

Language-neutral methods for syntactic analysis, transfer, and morphological and syntactical generation of feature structures are utilized by a natural language translation system to translation (sic) an *input expression* in a source language into an output expression in a target language. Duan at column 2, lines 13-17 (emphasis added).

Similarly, Adache explains that its translation methods occur in the context of sentences that are *input* into its system. See Adache at column 1, lines 49-58. Accordingly, neither reference discloses or suggests this feature of claim 1 and, for

1 at least this reason, the Office has failed to establish a *prima facie* case of
2 obviousness.

3 A second reason that the Office's *prima facie* case of obviousness fails with
4 respect to this claim is that both of the cited references teach *directly away* from
5 the feature of a user interface configured to allow a user to *select existing text* in a
6 non-native language and view a translation of the selected text in a native
7 language. As explained above, the embodiments discussed by both Duan and
8 Adache require the *input of text* from a user in order for their respective
9 embodiments to function as disclosed. Accordingly, both references teach directly
10 away from this recited feature.

11 Finally, the Office's *prima facie* case of obviousness fails for at least the
12 further reason that the Office has failed to provide sufficient motivation to
13 combine the cited references. The Office argues that the motivation to combine
14 these references is "to provide a processing method and a processor for machine
15 translation, which is capable of obtaining *in a short time* a complete or a partial
16 translated result for an original sentence input...." Office Action at page 4
17 (emphasis added). However, since both Duan and Adachi are capable of
18 translating input sentences, the Office is apparently emphasizing the ability to do
19 this "in a short time." Applicant submits that the Office's stated motivation is
20 simply a variation on the "efficiency" argument that has been deemed by the
21 Office itself to be an improper basis for a motivation to combine references. See,
22 e.g., the paper available at the following link:

23
24 <http://www.uspto.gov/web/menu/busmethp/busmeth103rej.htm>
25

1 This paper instructs that the motivation of efficiency is simply "too general
2 because it could cover almost any alteration contemplated." Likewise, Applicant
3 submits that the motivation of obtaining translation "in a short time" is also too
4 general in that it could cover almost any alteration contemplated of Duan and
5 Adachi.

6 Accordingly, and at least for the reasons discussed above, the Office has
7 failed to establish a *prima facie* case of obviousness for at least the reasons
8 discussed above and this claim is allowable.

9 **Claims 2-13** depend from claim 1 and thus are allowable as depending
10 from an allowable base claim. These claims are also allowable for their own
11 recited features which, in combination with those recited in claim 1, are neither
12 disclosed nor suggested by the references of record. In addition, to the extent that
13 claim 1 is allowable, the further rejection of claims 4 and 12 over Duan in view of
14 Adachi and in further view of McCarley is not seen to add anything of
15 significance. Finally, to the extent that claim 1 is allowable, the further rejection
16 of claim 9 over Duan in view of Adachi and in further view of Carbonell is also
17 not seen to add anything of significance.

18 **Claim 14** recites a reading system comprising:

- 19
- 20 • a user interface configured to allow a user to select existing English
21 language text and view a Chinese language translation of the selected
22 text; and
 - 23 • a cross-language reading wizard comprising:
 - 24 • a parser for parsing selected text into individual translation units,
 - 25 • a word translation selector for choosing candidate word translations for
the
 - translation units, and
 - a translation generator for translating the candidate word translations
into

- corresponding phrases in the Chinese language that can be presented to the user via the user interface.

In making out the rejection of this claim, the Office argues that its subject matter is obvious over Duan in view of Adachi. Applicant respectfully submits, however, that the Office has failed to establish a *prima facie* case of obviousness for at least the reasons discussed below.

First, the cited references fail to disclose or suggest all of this claim's recited features. That is, neither Duan nor Adachi disclose or suggest the feature of a user interface configured to allow a user to *select existing* English language *text* and view a Chinese language translation of the selected text. Both of these references operate on the principle that a user will *input* text into the system, and thus neither reference discloses nor suggests the feature of selecting *existing text*. This feature is simply missing from the cited references.

Further, both Duan and Adachi teach directly away from the selection of existing text for the purposes of translation. As explained above, the embodiments discussed by both Duan and Adache require the *input* of text from a user in order for their respective embodiments to function as disclosed. Accordingly, both references teach directly away from this claim's recited feature of allowing a user to *select existing* English language text.

Finally, the Office has failed to establish a proper motivation to combine the cited references. The Office provides that the motivation to combine these references is "to make the translation system more versatile." Office Action at page 3. However, Applicant submits that this is merely a variant of the "efficiency" argument that is discussed above. Like efficiency, the motivation of being "more versatile" is simply too general and could cover almost any

1 conceivable modification of the cited references. The Office's stated motivation
2 to combine these references is insufficient.

3 Accordingly, and at least for the reasons discussed above, the Office has
4 failed to establish a *prima facie* case of obviousness with respect to this claim.
5 This claim is allowable.

6 **Claim 15** depends from claim 14 and is thus allowable as depending from
7 an allowable base claim. This claim is also allowable for its own recited features
8 which, in combination with those recited in claim 14, are neither disclosed nor
9 suggested by the references of record. In addition, to the extent that claim 14 is
10 allowable, the further rejection of claim 15 over Duan in view of Adachi and in
11 further view of McCarley is not seen to add anything of significance.

12 **Claim 58** recites a reading system comprising:

- 13
- 14 • a user interface configured to allow a user to select existing text in a
 - 15 non-native language and view a translation of the selected text in a
 - 16 native language, wherein the user interface displays text translations
 - 17 adjacent text the user has selected for translation; and
 - 18 • a cross-language reading wizard comprising:
 - 19 • a parser for parsing selected text into individual translation units, the
 - 20 parser comprising a part-of-speech/base noun phrase identification
 - 21 module for tagging individual words with identifiers,
 - 22 • a word translation selector for choosing candidate word translations
 - 23 for the translation units, and
 - 24 • a translation generator for translating the candidate word translations
 - 25 into corresponding words or phrases in the native language that can
 - be presented to the user via the user interface.

26 In making out the rejection of this claim, the Office argues that its subject
27 matter is obvious over Duan in view of Adachi. Applicant respectfully disagrees

1 and submits that the Office has failed to establish a *prima facie* case of
2 obviousness for at least the reasons discussed below.

3 First, the cited combination of references fails to disclose or suggest all of
4 this claim's recited features. That is, neither reference discloses or suggests the
5 feature of a user interface configured to allow a user to *select existing text* in a
6 non-native language and view a translation of the selected text in a native
7 language. This feature is simply missing from both Duan and Adachi. Further,
8 neither reference discloses or suggests the feature of a parser comprising a part-of-
9 speech/base noun phrase identification module for tagging individual words with
10 identifiers. In point of fact, the Office fails to even address this feature in its
11 rejection of this claim. However, a careful review of the cited references reveals
12 that this feature is simply absent.

13 Further, and as explained above, both of the cited references teach directly
14 away from the feature of a user interface configured to allow a user to *select*
15 *existing text* in a non-native language and view a translation of the selected text in
16 a native language. An operating principle of both Duan and Adachi is that a user
17 *inputs text* into the system, and thus neither reference provides for the selection of
18 *existing text*.

19 Finally, the Office has failed to provide a sufficient motivation to combine
20 the cited references. The Office provides two separate statements of motivation
21 with respect to this claim. The first is to "improve sharply the efficiency of the
22 translation processing, including the edition efficiency." Office Action at page 6.
23 The second stated motivation is "to provide a processing method and a processor
24 for machine translation, which is capable of obtaining in a short time a complete
25 or a partial translated result for an original sentence input." Id. With respect to

1 the first statement of motivation, this is akin to the motivation of "efficiency" that
2 the Office itself has rejected as being an improper statement of the motivation to
3 combine under § 103 (See discussion above). With respect to the second
4 statement of motivation, this is simply a variant of the "efficiency" argument (as
5 also discussed above) and further fails to establish a sufficient motivation to
6 combine the cited references.

7 Accordingly, and at least for the reasons discussed above, the Office has
8 failed to establish a *prima facie* case of obviousness with respect to this claim.
9 This claim is allowable.

10 **Claims 59-60** depend from claim 58 and thus are allowable as depending
11 from an allowable base claim. These claims are also allowable for their own
12 recited features which, in combination with those recited in claim 58, are neither
13 disclosed nor suggested by the references of record.

14 **Claim 61** recites one or more computer readable media having computer-
15 readable instructions thereon which, when executed by one or more processors,
16 cause the one or more processors to implement a cross-language reading wizard
17 comprising:

- 18 • a user interface configured to allow a user to select existing text in a
19 non-native language and view a translation of the selected text in a
20 native language;
- 21 • a parser for parsing selected text into individual translation units, the
22 parser comprising a part-of-speech/base noun phrase identification
23 module for tagging individual words with identifiers,
- 24 • a word translation selector for choosing candidate word translations
25 for the translation units, and
- a translation generator for translating the candidate word translations
into corresponding words or phrases in the native language that can
be presented to the user via the user interface.

1
2 In making out the rejection of this claim, the Office argues that its subject
3 matter is obvious over Duan in view of Adachi. Applicant respectfully disagrees
4 and submits that the Office has failed to establish a *prima facie* case of
5 obviousness with respect to this claim for at least the reasons discussed below.

6 First, the cited references fail to disclose or suggest the feature of (emphasis
7 added):

- 8
- 9 • a user interface configured to allow a user to *select existing text* in a
10 non-native language and view a translation of the selected text in a
11 native language

12 or the further feature of:

- 13
- 14 • [a] parser comprising a part-of-speech/base noun phrase
15 identification module for tagging individual words with identifiers

16 These features are simply absent from the cited references.

17 As further discussed above, both Duan and Adachi teach directly away
18 from the feature of a user interface configured to allow a user to *select existing*
19 *text* in a non-native language and view a translation of the selected text in a native
20 language. In contrast, both of the cited references operate under the principle that
21 text is *input into* the respective systems by a user in order for translation to occur.

22 Finally, the Office has failed to provide a proper motivation to combine the
23 cited references. The motivation provided (as quoted above in the discussion of
24 claim 1) is merely a variation of the efficiency motivation that the Office has
25 deemed insufficient to establish a motivation to combine references under § 103.

1 Accordingly, and at least for these reasons, the Office has failed to establish
2 a *prima facie* case of obviousness with respect to this claim. This claim is
3 allowable.
4

5 **Conclusion**

6 All of the claims are in condition for allowance. Accordingly, Applicant
7 requests a Notice of Allowability be issued forthwith. If the Office's next
8 anticipated action is to be anything other than issuance of a Notice of Allowability,
9 Applicant respectfully requests a telephone call for the purpose of scheduling an
10 interview.
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12 Respectfully Submitted,

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